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Attorneys for Defendant Barrick Goldstrike Mines, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FRED COLEMAN,

Plaintiff,

vs.

BARRICK GOLDSTRIKE MINES, INC., A
FOREIGN CORPORATION,

Defendant.

CASE NO.: 3:20-CV-00718-MMD-CLB

**STIPULATED MOTION TO EXTEND
TIME TO FILE JOINT PRETRIAL
ORDER**

(SECOND REQUEST)

Pursuant to Local Rule (“LR”) IA 6-1, LR IA 6-2, and LR 26-3, Defendant Barrick Goldstrike Mines, Inc. (“Barrick”) and Plaintiff Fred Coleman (“Coleman”), by and through their undersigned counsel, hereby move the Court for a stipulated extension of the current August 31, 2023 deadline (ECF No.75) to file the Joint Pretrial Order required by LR 16-3. The parties respectfully request

that the deadline to submit the Joint Pretrial Order be extended up to and including **Monday, October 2, 2023**. This is the second requested extension concerning the Joint Pretrial Order. The prior extension was requested to allow the parties additional time to draft their respective sections of the Joint Pretrial Order following the unsuccessful Virtual Settlement Conference held on June 15, 2023. (*see* ECF Nos. 71, 75).

The parties agree that good cause exists for this extension. The parties have continued to work diligently to prepare their respective portions of the proposed Joint Pretrial Order. However, pre-existing obligations in other matters necessitate additional time to complete this comprehensive document. Additionally, Defendant's counsel has injured his knee and is scheduled for surgery at the end of August, further necessitating this extension. This extension is not sought to extend "a discovery deadline or to reopen discovery," thus the provisions of LR 26-3(a)–(d) are not implicated.

WHEREFORE, the parties stipulate and respectfully request that the Court enter an order extending the time by which the parties must file the Joint Pretrial Order up to and including **Monday, October 2, 2023**.

DATED this 14th day of August, 2023.

OGLETREE DEAKINS, NASH, SMOAK &
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/s/ David C. Castleberry

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WHITE & HILFERTY

/s/ Michael P. Hilferty (with permission)

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Daniel T. Hayward, NV Bar #5986

BRADLEY, DRENDEL & JEANNEY

*Attorneys for Attorneys for Plaintiff Fred
Coleman*

IT IS SO ORDERED.

DATED: 8/14, 2023.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of August, 2023, I served the foregoing
STIPULATED MOTION TO EXTEND TIME TO FILE JOINT PRETRIAL ORDER
(SECOND REQUEST) on the persons identified below as indicated:

Daniel T. Hayward	<input type="checkbox"/>	U.S. Mail – Postage Prepaid
BRADLEY, DRENDEL & JEANNEY	<input type="checkbox"/>	Hand Delivery
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